

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA**

<b>LIBBIE E. WILLIAMS</b>	*	<b>CIVIL ACTION</b>
	*	
<b>VERSUS</b>	*	<b>NUMBER: _____</b>
	*	
<b>LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM</b>	*	<b>DISTRICT JUDGE:</b>
	*	
	*	<b>MAGISTRATE JUDGE:</b>

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**NOTICE OF REMOVAL**

**NOW INTO COURT**, through undersigned counsel, comes the Defendant, **THE LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM (“LCTCS”)**, who respectfully petition this Honorable Court for removal of this action pursuant to 28 U.S.C. §1331, §1343 and §1443 as follows:

1.

On November 8, 2024, Libbie E. Williams (“Plaintiff”) filed her Petition for Damages in the 14<sup>th</sup> Judicial District Court, Parish of Calcasieu, entitled *Libbie E. Williams v. Louisiana Community and Technical College System*, Civil Action No. C-2024-4723, Division “H”.

2.

The Defendant was served with citation of this suit on November 13, 2024. This Notice of Removal is timely under the provisions of 28 U.S.C. §1446(b), as it is filed within 30 days of the State’s receipt of notice of the filing of Plaintiff’s Petition for Damages.

3.

The Defendant is in the process of requesting a copy of all processes, pleadings, and orders served upon the Defendant in the state court action along with all documents filed in the state court

action available. The Defendant will supplement this Notice of Removal, upon receipt of the state court's file.

4.

The Plaintiff alleges violations of federal law pursuant to racial discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964. Because she based her causes of action upon alleged violations of federal law, this Honorable Court has subject matter jurisdiction over this lawsuit pursuant to 28 U.S.C. §§1331 and 1343. The Defendant respectfully requests removal of the Plaintiff's suit to this Honorable Court pursuant to 28 U.S.C. §1443.

5.

Pursuant to 28 U.S.C. §1446(d), the Defendant has contemporaneously to this filing, served written notice of this removal to all adverse parties. To the best of the Defendant's knowledge, information, and belief, no other defendants have been named and/or served with the Petition for Damages.

6.

A copy of this Notice of Removal was also contemporaneously filed with the Calcasieu Parish Clerk of Court, where this action was originally filed. Pursuant to 28 U.S.C. §1446(a), and Rule 11 of the Federal Rule Civil Procedure, undersigned counsel states and avers that this Notice of Removal is well grounded in fact, is warranted by existing law, and that the matter is within the jurisdiction of this Court because Plaintiff's state action is pending in Calcasieu Parish, which is in the Western District of Louisiana.

**WHEREFORE**, the Defendant, **THE LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM**, prays that the action, now pending in the 14<sup>th</sup> Judicial

District Court, Parish of Calcasieu, State of Louisiana, Civil Action No. C-2024-4723 "H", be removed to the United States District Court for the Western District of Louisiana.

Respectfully Submitted,

**LIZ MURRILL**  
**ATTORNEY GENERAL**

BY:

  
**MAYLAN M. CRUICKSHANK**  
**ASSISTANT ATTORNEY GENERAL**  
Bar Roll No. 41058

**LOUISIANA DEPARTMENT OF JUSTICE**  
**LITIGATION DIVISION**

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*Counsel for the Louisiana Community and  
Technical College System*

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<b>LOUISIANA COMMUNITY AND TECHNICAL COLLEGE SYSTEM</b>	*	<b>DISTRICT JUDGE:</b>
	*	
	*	<b>MAGISTRATE JUDGE:</b>

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 12<sup>th</sup> day of December 2024, the foregoing was electronically filed using the Court's CM/ECF system and that a copy of the foregoing was served on **all counsel of record** for the Plaintiff by email and U.S. Mail.

**Libbie E. Williams**  
*Plaintiff, through her attorney of record*  
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/s/Maylan M. Cruickshank  
**MAYLAN M. CRUICKSHANK**